

EXHIBIT B

Declaration of Ronald Green

Marc J. Randazza (NV Bar No. 12265)
Ronald D. Green (NV Bar No. 7360)
Alex J. Shepard (NV Bar No. 13582)
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, NV 89117
Telephone: 702-420-2001
ecf@randazza.com

*Attorneys for Defendants
Stephen Fairfax and MTechnology*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SWITCH, LTD.,
a Nevada limited liability company,

Plaintiff,

vs.

STEPHEN FAIRFAX; MTECHNOLOGY;
DOES 1 through 10; and ROE ENTITIES 11
through 20, inclusive,

Defendants.

Case No.: 2:17-cv-02651-GMN-VCF

DECLARATION OF RONALD D. GREEN

I, Ronald D. Green, Jr., under penalty of perjury, hereby declare as follows:

1. I am a partner at the law firm Randazza Legal Group, PLLC and counsel for Defendants MTechnology ("MTech") and Stephen Fairfax in the above-referenced matter.

2. I am over the age of 18 and I make the statements in this declaration pursuant to my own first-hand knowledge and would be competent to testify to the statements made therein.

3. Plaintiff Switch, Ltd. ("Switch") and Defendants MTech and Mr. Fairfax differ on the appropriate contents of the eventual protective order that will govern this case.

4. The parties have attempted in good faith to resolve these differences by conducting two meet and confer conferences on August 23, 2019 and August 29, 2019.

5. Despite these attempts, the parties have been unable to resolve their differences, necessitating the intervention of this Court.

6. During the meet and confer conference on August 29, 2019, Sam Castor, in-house counsel for Switch, said on two separate occasions that Switch needed discovery in this case to "substantiate" its anticipated claims against Aligned Data Centers, one of Switch's primary competitors.

7. Mr. Castor additionally misrepresented that Switch had dismissed its claims against Aligned Data Centers in the U.S. District Court for the Eastern District of Texas without prejudice. However, those claims were dismissed with prejudice.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 3rd day of September, 2019.

/s/ Ronald D. Green
Ronald D. Green, Esq.